



CHILD PROTECTION AND SAFEGUARDING POLICY

Policy

People

Procedures

Accountability







ORGANISATION	SPORT EVOLUTION ALLIANCE (SEA)
Policy owner	Board of Sport Evolution Alliance
Operational responsibility	SEA Safeguarding Focal Point, appointed by the Board
Approved by	Board of Sport Evolution Alliance
Approval date	19 August 2026
Next review	August 2028
Version	2.1

Purpose and commitment

Sport Evolution Alliance (SEA) is committed to ensuring that all children participating in or affected by its activities are protected from abuse, exploitation, neglect, discrimination and any other form of harm. SEA recognises every child as a rights holder and considers safety, dignity, wellbeing and best interests a fundamental responsibility across its programmes, projects, events, research, training, communication and partnerships. This Policy applies to all SEA activities involving or potentially affecting persons under 18. SEA adopts zero tolerance of abuse, exploitation and harmful behaviour. The Policy follows the four Keeping Children Safe organisational areas: Policy, People, Procedures and Accountability.

The four safeguarding standards

1 POLICY	Prevent and respond appropriately to harm to children.
2 PEOPLE	Clear responsibilities, safe recruitment, conduct and learning.
3 PROCEDURES	Child-safe risk management, reporting and operational safeguards.
4 ACCOUNTABILITY	Monitor, review and improve safeguarding measures.



1 STANDARD POLICY

Scope

This Policy applies to SEA management and employees, consultants, experts, volunteers, interns, trainers, facilitators, researchers, project staff, relevant contractors/service providers, partner organisations, Associated Partners and anyone acting on SEA's behalf. Compliance with this Policy and the SEA Safeguarding Code of Conduct is a condition of involvement in SEA activities concerning children.

Guiding principles

- Best interests of the child.
- Do no harm.
- Non-discrimination and equal protection.
- Meaningful, age-appropriate participation.
- Respect and dignity.
- Confidentiality and privacy.
- Shared responsibility for safeguarding.

Portuguese and international legal framework

For activities in Portugal, this Policy will be applied in accordance with applicable Portuguese law, in particular:

- Lei n.º 147/99, de 1 de setembro – Lei de Proteção de Crianças e Jovens em Perigo (LPCJP), in its current wording. Communication is mandatory for any person who becomes aware of a situation placing a child's life, physical or psychological integrity, or freedom at risk.
- Lei n.º 113/2009, de 17 de setembro, in its current wording – SEA will apply the legally required criminal-record suitability checks for functions or activities involving regular contact with minors, including applicable periodic renewal requirements.
- Regulation (EU) 2016/679 (GDPR) and Lei n.º 58/2019, de 8 de agosto – for processing personal data, including children's data, images, research and evaluation information.

SEA will also act consistently with the UN Convention on the Rights of the Child, the EU Charter of Fundamental Rights and relevant international safeguarding standards. Activities outside Portugal must also comply with applicable local law.

Forms of harm

- Physical, emotional or psychological abuse; sexual abuse, exploitation or harassment; neglect.
- Bullying/cyberbullying; discrimination; gender-based violence; grooming; coercive or controlling behaviour.
- Inappropriate physical contact; abuse of authority or trust; online abuse or exploitation.

Non-consensual creation/sharing of intimate images; exploitation for financial, sporting or promotional purposes.

Unsafe organisational practices even where deliberate abuse has not occurred.



2 STANDARD PEOPLE

Responsibilities and safeguarding contacts

The SEA Board has ultimate organisational oversight. Juliane Robra, as SEA Safeguarding Focal Point, will coordinate implementation of this Policy, receive safeguarding concerns, maintain safeguarding records, support referrals, monitor compliance and advise SEA projects and activities involving children.

Role	Name / position	Contact
Safeguarding Focal Point	Juliane Robra	juliane.robra@sportevolutionalliance.com +41 797754749
Alternate Safeguarding Contact	Nuno Dias	nuno.dias@sportevolutionalliance.com +351 964294066

The Alternate Contact must be used when the Focal Point is unavailable or implicated. If internal reporting could increase risk, the concern should be reported directly to the competent external authority.



Safe recruitment and selection

SEA will use proportionate suitability measures including identity/qualification verification, references, safeguarding questions, experience checks and acceptance of this Policy and Code of Conduct. For roles involving regular contact with minors in Portugal, SEA will request and assess the criminal-record certificate required by Lei n.º 113/2009, including the applicable annual re-check after recruitment.

Training and awareness

Persons involved with children will receive role-appropriate safeguarding information covering recognition of harm, boundaries, disclosures, reporting, online safeguarding, equality, communication, privacy and data protection. They are not expected to investigate allegations: their role is to recognise, respond safely, record and report.

Code of Conduct

All persons representing SEA in activities involving children must comply with Annex I and sign its Declaration of Commitment before direct involvement with children.

3 STANDARD PROCEDURES

Risk assessment and safe activity design

A safeguarding risk assessment must be completed before activities involving direct contact with children. It should cover physical environments, adult-child and peer interactions, travel, accommodation, changing facilities, online activity, photography, sensitive discussions, accessibility, data collection and possible disclosures. Annex IV provides the template. Children will never be required to disclose personal experiences of violence.

Specific rules for sport, youth activities, travel and accommodation

- One-to-one contact: avoid isolated situations where reasonably possible. Meetings should be observable or interruptible; another responsible adult should know when necessary one-to-one contact occurs.
- Physical contact: must be necessary, activity-appropriate, respectful of boundaries and never sexualised, punitive, humiliating or unnecessarily prolonged.
- Changing rooms/showers: adults should not normally change or shower with children. Adult entry should occur only where necessary for safety/supervision and, where possible, with another adult present. Photography/video is strictly prohibited.
- Transport: avoid transporting a child alone where reasonably possible. Travel arrangements, responsible adults, emergency contacts and collection/drop-off procedures should be agreed in advance.
- Trips/overnight stays: require prior risk assessment, emergency arrangements, appropriate supervision and clear information to parents/legal guardians and participants.
- Accommodation: adults must not share bedrooms with children except under an exceptional, formally assessed care/safety arrangement. Room allocation must respect age, privacy, gender and individual safeguarding needs.
- Alcohol/substances: adults responsible for children must remain capable of safeguarding. Illegal drugs and provision of age-restricted substances to children are prohibited.
- Medical/personal care: first aid and medical support must respect dignity and privacy and, where possible, be transparent and documented.



Online communication and social media

- Use institutional, project or otherwise transparent channels wherever possible.
- Avoid secret, sexualised, overly personal or inappropriate private messaging with children.
- For group activities, normally use group channels and, where appropriate, include another responsible adult or parent/legal guardian.
- Never request, send, store or share sexual or intimate content involving a child.
- Do not use a position of trust to initiate inappropriate personal relationships through social media.
- Online sessions must apply the same safeguarding standards as in-person activities, including moderation, privacy settings and reporting arrangements.

Photography, video and use of images

- Identify the appropriate lawful basis and obtain required permissions before collecting or publishing identifiable images/videos.
- Participation should not, wherever practicable, depend on agreeing to promotional photography/video.
- Children and parents/legal guardians must receive clear information on intended use, channels and retention.
- No photography/recording in changing rooms, showers, bedrooms or other private situations.
- Images must preserve dignity and avoid sexualised, humiliating, stereotypical or victimising representation.
- Avoid unnecessary identifying information with a child's image where this could create risk.
- Do not reuse images for materially different purposes without an appropriate legal basis and information to the data subject.

**Responding to a safeguarding concern or disclosure**

1. Listen calmly and respectfully.
2. Reassure the child that the concern is taken seriously; do not promise absolute confidentiality.
3. Do not investigate, confront the alleged person responsible, or ask unnecessary/leading questions.
4. Record facts accurately, using the child's own words where relevant, and distinguish fact from opinion.
5. Report as soon as possible to the Safeguarding Focal Point or Alternate Contact using Annex II.
6. If there is immediate or imminent danger, prioritise safety and contact competent emergency, police or child-protection authorities without delay.

Reporting and referral pathway

Situation	Action
Immediate/imminent danger or serious threat	Protect the child; contact competent emergency/police/child-protection authorities immediately; inform SEA Safeguarding Focal Point as soon as safely possible.
Concern/disclosure without immediate danger	Record and report promptly to the Focal Point; assess next steps/referral according to law and the child's best interests.
Concern involves Focal Point	Report to Alternate Contact and, where necessary, directly to competent external authorities.
Concern involves SEA leadership / internal reporting may increase risk	Report directly to competent external authorities and preserve relevant information securely.

In Portugal, referrals may include the competent Comissão de Proteção de Crianças e Jovens (CPCJ), police authorities or judicial authorities/Ministério Público, according to the nature and urgency of the situation and the LPC-JP. SEA will not replace competent authorities or specialist services.

Emergency and external safeguarding contacts – Portugal

Situation / Service	Action
Immediate danger or emergency	112 – European Emergency Number (24/7)
Child protection concern	CPCJ – Comissão de Proteção de Crianças e Jovens of the child's area of residence. Find the competent CPCJ: CNPDPCJ contacts
Crime / judicial intervention	Police authorities or Ministério Público
SOS Criança	116 111 – Child Helpline
APAV – Victim Support	116 006 – free and confidential support, weekdays 08:00–23:00

Confidentiality and safeguarding records

Safeguarding information will be handled on a strict need-to-know basis. Records will be factual, dated, securely stored and accessible only to authorised persons. Information may be shared where necessary to protect a child, comply with legal obligations or enable competent authorities/safeguarding professionals to respond.

Data protection

Children's personal data will be processed in accordance with GDPR, Lei n.º 58/2019 and applicable law, applying lawfulness/transparency, purpose limitation, data minimisation, security, restricted access, appropriate retention and anonymisation/pseudonymisation where appropriate. Consent will not automatically be assumed to be the correct legal basis; SEA will identify and document the appropriate lawful basis.



4 STANDARD ACCOUNTABILITY

Implementation and monitoring

SEA will ensure that this Policy is implemented in practice through designated responsibilities, risk assessment, awareness/training, reporting/referral procedures, monitoring, secure documentation and oversight of partners/external providers.

Partners and external organisations

Before a partner directly involves children in a SEA-led or jointly implemented activity, safeguarding responsibilities must be clarified. SEA will seek evidence of an appropriate Child Protection Policy or, where appropriate, require formal adherence to SEA safeguarding requirements. Serious concerns may result in suspension or termination of the activity/cooperation.

Complaints, concerns and non-retaliation

Children, parents/legal guardians, staff, partners and stakeholders must be able to raise concerns without fear of retaliation. Reporting channels will be accessible and age-appropriate. Good-faith concerns will be treated seriously, respectfully and confidentially. Retaliation is prohibited.

Review and learning

This Policy will be reviewed at least every two years, or earlier if law/standards change, a serious incident occurs, monitoring identifies weaknesses, or SEA's activities involving children substantially change.

Compliance with European values

This Policy is grounded in the UN Convention on the Rights of the Child, the EU Charter of Fundamental Rights, applicable EU/national law, and the values of human dignity, equality, human rights and non-discrimination established in Article 2 TEU.

Declaration of organisational commitment

Sport Evolution Alliance commits to implementing this Policy across its activities involving children and continuously strengthening its safeguarding practices.

Approved on behalf of SEA	Action
Name	Rui Vieira
Position	Director
Signature	
Date	19 August 2026





ANNEX I – SEA SAFEGUARDING CODE OF CONDUCT

This Code applies to all SEA staff, experts, volunteers and other adults acting on behalf of SEA in activities involving children.

I WILL:

Treat every child fairly, respectfully and without discrimination.
Prioritise children's safety, dignity, wellbeing and best interests.
Maintain appropriate professional and physical boundaries.
Use age-appropriate, respectful and transparent communication.
Follow SEA rules for one-to-one contact, changing facilities, travel, accommodation, online communication and images.
Respect a child's right to decline unnecessary physical contact or promotional photography.
Report safeguarding concerns promptly and cooperate with safeguarding procedures.

I WILL NEVER:

Engage in sexual or sexually suggestive behaviour with a child.
Use humiliating, threatening, degrading, discriminatory or abusive language or punishment.
Exploit a position of authority, trust or dependency.
Initiate secret or inappropriate private communication or relationships with a child.
Share a bedroom with a child except under an exceptional, formally assessed care/safety arrangement.
Take photographs or recordings in changing rooms, showers, bedrooms or private situations.
Request unnecessary disclosure of sensitive personal experiences.
Ignore, conceal or personally investigate a safeguarding concern.

Declaration of commitment	
Name	
Role / organisation	
Signature	
Date	



ANNEX II – SAFEGUARDING CONCERN / INCIDENT REPORT FORM

Complete as soon as possible after the concern. Record facts objectively. Do not investigate. Store securely.

Field	Information
Date/time of report	
Person completing form / contact	
Child / young person (minimum necessary identifying information)	
Date/time/location of incident or disclosure	
Nature of concern	
What was seen/heard/disclosed (exact words where relevant)	
Immediate safety action taken	
Other persons present / witnesses	
Person to whom concern was reported / date/time	
External referral made, if any	
Follow-up required	
Immediate risk identified	☐ Yes ☐ No
Safeguarding Focal Point assessment / decision	





ANNEX III – SAFEGUARDING REPORTING FLOWCHART

CONCERN / DISCLOSURE / OBSERVATION



Is there immediate or imminent danger?

YES	NO
Protect the child. Contact competent emergency/police/child-protection authority immediately. Then inform SEA Safeguarding Focal Point as soon as safely possible.	Listen → Reassure → Do not investigate → Record facts → Report promptly to SEA Safeguarding Focal Point.

Safeguarding Focal Point assesses protection, legal reporting/referral, confidentiality and follow-up requirements.

If the Focal Point is implicated or unavailable → Alternate Safeguarding Contact. If internal reporting may increase risk → competent external authority.

External safeguarding contacts in Portugal:

Immediate danger: 112 | CPCJ: child's area of residence | SOS Criança: 116 111 | APAV: 116 006 | Police / Ministério Público where appropriate.



ANNEX IV – ACTIVITY SAFEGUARDING RISK ASSESSMENT

Activity / project					
Location / dates					
Responsible person					
Children involved (age range / approximate number)					
Safeguarding Focal Point for activity					
Risk / hazard	Who may be affected	Likelihood (L/M/H)	Impact (L/M/H)	Mitigation / controls	Responsible person

Minimum areas to consider: adult-child contact; peer interactions; physical activity/contact; changing facilities; transport; travel/accommodation; online communication; photography/video; sensitive discussions; disability/ accessibility; data collection; medical/emergency arrangements; disclosure/referral.

Assessment completed by	
Date	
Approved by	
Review date / trigger	





LEGAL AND POLICY REFERENCES

- Lei n.º 147/99, de 1 de setembro – Lei de Proteção de Crianças e Jovens em Perigo, as amended.
- Lei n.º 113/2009, de 17 de setembro – measures concerning suitability for functions involving regular contact with minors, as amended.
- Regulation (EU) 2016/679 – General Data Protection Regulation (GDPR).
- Lei n.º 58/2019, de 8 de agosto – implementation of the GDPR in Portugal.
- United Nations Convention on the Rights of the Child.
- EU Charter of Fundamental Rights.
- Keeping Children Safe – Child Safeguarding Standards.

This Policy is an organisational safeguarding framework and should be reviewed when relevant legal requirements or SEA activities change.







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